

Southern Communications Services, Inc.
d/b/a/ Southern Linc
5555 Glenridge Connector, Suite 500
Atlanta, Georgia 30342

September 6, 2019

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Review of the Commission's Rules Governing the 896-901/935-940 MHz Band; WT Docket No. 17-200

Dear Ms. Dortch:

On September 4, 2019, Michael Rosenthal and Kasey Chow of Southern Communications Services, Inc. d/b/a Southern Linc ("Southern Linc"), Alan McIntyre of Southern Linc (by phone), Coy Trosclair of Southern Company Services, Inc., Allen Bell of Georgia Power Company, and J. Wells Ellenberg of Southern Company (collectively, "Southern"), along with David Rines, outside counsel to Southern, met with Roger Noel, Amanda Huetinck, Lloyd Coward, and Moslem Sawez of the Wireless Telecommunications Bureau. During this meeting, we discussed Southern's views on the Commission's proposals for the reconfiguration of the 900 MHz band (896-901/935-940 MHz) to facilitate the development of broadband technologies and services, as described in detail in Southern's filings in response to the Commission's *NPRM*.¹

Southern expressed its support for the creation of a 3/3 MHz broadband segment in the 900 MHz band, which would provide utilities and other CII and enterprise entities with access to much-needed broadband spectrum, and encouraged consideration of a 5/5 MHz broadband segment in areas where there is no opposition by incumbents in the area or in the adjacent areas. Southern explained the need that utilities and other CII entities have for dedicated broadband spectrum that provides the high data capacity and low latency necessary for the deployment of technologies and applications that support the increasing reliability, security, and efficiency needs of the nation's energy

¹ / *Review of the Commission's Rules Governing the 896-901/935-940 MHz Band*, WT Docket No. 17-200, Notice of Proposed Rulemaking, FCC 19-18 (rel. March 14, 2019) ("*NPRM*"); Comments of Southern Company Services, Inc., WT Docket No. 17-200 (filed June 3, 2019); Reply Comments of Southern Company Services, Inc., WT Docket No. 17-200 (filed July 2, 2019).

Marlene H. Dortch, Secretary
WT Docket 17-200
September 6, 2019

infrastructure. Southern also explained that commercial broadband service providers generally cannot meet the levels of coverage, capacity, reliability, and security required for utility and CII operations and are unable to provide the dedicated capacity needed for data-intensive, low latency CII applications and uses.

As the owner and operator of an extensive Advanced Metering Infrastructure (“AMI”) system in the adjacent Narrowband PCS band, Southern stated that it is no longer concerned that the proposed realignment – as set forth in the *NPRM* – will result in interference to its AMI system, so long as deployment of a 900 MHz broadband system is carried out in an educated and intelligent way.

Southern agrees that a market-driven voluntary exchange process would best facilitate the realignment of the 900 MHz band, but recommended a finite period for the voluntary exchange process of 2-3 years, after which some form of mandatory relocation will be necessary in order to mitigate against the holdout problem and ensure an efficient and complete transition process. Southern generally supports performance requirements based on geographic coverage, but emphasized the need for the Commission to also adopt alternative performance standards, such as an alternative “substantial service” showing that the licensee’s use of the spectrum is consistent with the public interest.

Finally, Southern discussed the experience of Southern Linc in deploying its LTE network, which required Southern Linc to simultaneously operate both LTE and iDEN platforms on its 800 MHz frequencies until all of its iDEN customers could be transitioned to LTE. On the basis of this experience, Southern strongly cautioned the Bureau on the shortcomings of a 1.4/1.4 MHz LTE channel configuration, which Southern found to be insufficient to support many utility and CII needs.

In accordance with Section 1.1206 of the Commission’s rules, this letter is being filed electronically in the above-referenced proceeding.

Respectfully submitted,

/s/ Michael D. Rosenthal

Michael D. Rosenthal
Director of Legal & External Affairs
Southern Linc

cc: Roger Noel
Amanda Huetinck
Lloyd Coward
Moslem Sawez